

1 Z. RYAN PAHNKE

Nevada Bar No. 9641

2 **RAY QUINNEY & NEBEKER P.C.**

3 36 South State Street, Suite 1400

Salt Lake City, Utah 84145-0385

4 Telephone: (801) 532-1500

Email: rpahnke@rqn.com

5 David J. Malley

6 Nevada Bar No. 8171

JOLLEY URG A WOODBURY & HOLTHUS

7 50 S. Stephanie Street, Suite 202

Henderson, Nevada 89012

8 Telephone: (702) 699-7500

Email: djm@juwlaw.com

9 *Designated for service pursuant to LR IA 11-1(b)*

10 *Attorneys for Plaintiff Thomas Brown*

11
12 **UNITED STATES DISTRICT COURT**
13 **IN AND FOR THE DISTRICT OF NEVADA**
14

15 THOMAS BROWN, an individual,

16 Plaintiff

17 vs.

18 AUTOMOBILI LAMBORGHINI
19 AMERICA, LLC, a Delaware limited liability
20 company; FINDLAY DIGUILIO, LLC, d/b/a
LAMBORGHINI LAS VEGAS, a/k/a A
Findlay Automotive Property,

21 Defendants

Case No. 2:23-CV-1415-CDS-BNW

**JOINT STIPULATION AND ORDER TO
EXTEND THE DEADLINE TO RESPOND
TO DEFENDANTS' MOTION TO
DISMISS PLAINTIFF'S MAGNUSON-
MOSS WARRANTY ACT AND BREACH
OF EXPRESS WARRANTY CLAIMS**

(FIRST REQUEST)

22
23
24
25 IT IS HEREBY STIPULATED AND AGREED, by Plaintiff Thomas Brown
26 ("Plaintiff"), and Defendant Automobili Lamborghini America, LLC ("ALA"), Defendant
27 Findlay Diguilio, LLC d/b/a Lamborghini Las Vegas, a/k/a A Findlay Automotive Property
28

1652729

(“LVV”) (collectively, “Defendants”), through their respective counsel, that the time for Plaintiff to respond to *Defendants’ Motion to Dismiss Plaintiff’s Magnuson-Moss Warranty Act and Breach of Express Warranty Claims* (“Defendants’ Motion to Dismiss”) be extended up to and including November 8, 2023. Plaintiff’s current deadline to respond to Defendants’ Motion to Dismiss is October 25, 2023. The parties are in the process of considering the willingness to attempt alternative dispute resolution. The additional time stipulated to herein will allow the parties to continue to explore a potential early resolution of the claims in this case.

The reason for the extension is not for purposes of delay or to cause prejudice to any party, but to allow the parties to continue to discuss settlement options. This is the parties’ first request for such an extension from the Court. This request complies with Local Rules IA 6-1, IA 6-2, and 7-1.

DATED this 24th day of October, 2023.

RAY QUINNEY & NEBEKER P.C.

SNELL & WILMER L.L.P.

/s/ Z. Ryan Pahnke

/s/ Dawn L. Davis

Z. Ryan Pahnke

Dawn L. Davis

Nevada Bar No. 9641

Nevada Bar No. 13329

Attorneys for Plaintiff Thomas Brown

Christian P. Ogata

Nevada Bar No. 15612

David J. Malley

Attorney for Defendants Automobili

Nevada Bar No. 8171

Lamborghini America, and Findlay

Designated counsel pursuant to LR IA 11-1(b)

DiGuilio, LLC dba Lamborghini Las Vegas

ORDER

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

Dated October 25, 2023